

Statement of Basis
IIG MinWool LLC
Phenix City, Russell County, Alabama
Facility No. 211-0013

DESCRIPTION

On November 9, 2016, the Department received a permit modification request from IIG MinWool LLC for MSOP No. 211-0013. The facility requested a modification of a proviso requiring a minimum pressure drop for three filterhouses be established during annual compliance testing. The facility proposes to standardize the minimum pressure drop to 0.2 in. W.C., which represents the lowest pressure drop for the filterhouses during the last three annual compliance tests. Those tests showed maximum combined PM emissions of 15.8 lb/hr, well below the combined PM emissions limit of 117.0 lb/hr. This modification is not expected to lead to an increase of emissions or compromise the effectiveness of the filterhouses.

On December 1, 2016, the Department received an additional permit modification request regarding minimum temperature requirements for a cupola incinerator and curing oven incinerator. The cupola incinerator and oven incinerator have emissions standards that state their operating temperatures shall not drop below 1320°F and 1200°F, respectively. This is also a CAM requirement for the cupola incinerator. These specific temperature limits were established during initial compliance testing to satisfy BACT requirements for their original permits. They represent the average of five-minute temperature readings over the course of the three-hour compliance testing. The facility proposes a modification of the permit language to specify that the temperature limits represent three-hour averages, as was the case during the compliance tests.

EMISSIONS

The proposed modifications would not change the facility's emissions.

REGULATIONS

ADEM 335-3-14.04 Prevention of Significant Deterioration (PSD)

This facility is a major source with respect to PSD. The current minimum temperature requirements for the incinerators are part of the facility's original BACT limits.

ADEM 335-3-16 Major Source Operating Permit (Title V)

This facility is a major source with respect to Title V. The proposed modifications involve changing emissions standards and monitoring requirements. Therefore, this would be treated as a significant modification.

Air Toxics Review/112(g)

No new emissions or change in emissions would occur due to these permit modifications. No air toxics review or 112(g) case-by-case review is required.

Class I Areas

The nearest Class I Area is Bradwell Bay, located approximately 248 km from the facility. The facility is not expected to have a significant impact on this or any Class I Area.

40 CFR 60 New Source Performance Standards (NSPS)

This facility is not subject to any NSPS subparts.

40 CFR 63 National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is subject to 40 CFR 63 Subpart DDD, “National Emission Standards for Hazardous Air Pollutants for Mineral Wool Production”. The proposed modifications would not change any requirements under this subpart.

PERIODIC MONITORING AND COMPLIANCE ASSURANCE MONITORING (CAM)

The cupola is subject to CAM requirements due to carbon monoxide emissions that exceed 100 TPY. The current minimum temperature requirement is part of the CAM requirements. The proposed modification would specify a 3-hour averaging time.

RECORDKEEPING AND REPORTING

The proposed modification would not change any recordkeeping or reporting requirements.

RECOMMENDATION

Based on the above information, I recommend modifying IIG MinWool LLC’s permit to standardize the minimum pressure drop for baghouses to 0.2 inches W.C. and to specify that the three-hour average incinerator temperatures shall not drop below the required limits. If these requirements are adhered to, the Permittee should be in compliance with all state and federal regulations.

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Energy Branch
Air Division

DRAFT
Date